

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

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THOMAS E. PEREZ, Secretary of Labor,  
United States Department of Labor

Plaintiff,

v.

Civil Action No. 4:14-CV-997-O

DALLAS-FORT WORTH DOMICILE,  
ALLIED PILOTS ASSOCIATION,

and

ALLIED PILOTS ASSOCIATION,  
NATIONAL HEADQUARTERS,

Defendants.

**AGREED JOINT MOTION TO ENLARGE DEFENDANTS' DEADLINE  
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

The parties to this case jointly request that the defendants' deadline to answer or otherwise respond to the complaint be enlarged by thirty days, and as support would respectfully show as follows:

1. In this action, the Secretary of Labor seeks to invalidate an election of union officers conducted by the Allied Pilots Association and its Dallas-Fort Worth Domicile (which is the union for American Airlines pilots). The source of the controversy lies in the union's use of an internet-based electronic voting system. A union member protested the election, alleging that the system permits the names of voters to be linked to their voting choices and does not allow an observer to effectively observe the

election. The union's Appeal Board found otherwise and rejected the protest, and the union member then filed a complaint with the Department of Labor. After an investigation, the Secretary of Labor filed this action under Title IV of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §§ 481–484, which requires union officer election be conducted by secret ballot and provides candidates with the right to have election observers.

2. Since shortly after suit was filed, the parties have been in contact about potential ways to resolve and settle their controversy without the need for extensive litigation or any court rulings. In furtherance of this goal, the parties have scheduled a meeting to be held in Washington, D.C., in early March, which will be personally attended by the undersigned U.S. Attorney as well as representatives of the Department of Labor and the union.

3. The defendants executed a waiver of service sent December 15, 2014, and therefore their deadline to answer or otherwise respond to the complaint is presently February 13, 2015. In light of the ongoing discussions between the parties and the meeting scheduled in Washington, D.C., for early March, the parties request that the defendants' deadline to answer or otherwise respond to the complaint be enlarged by thirty days, to allow the parties to focus on their settlement discussion and upcoming meeting.

FOR ALL THESE REASONS, the parties respectfully request that the defendants' deadline to answer or otherwise respond to the complaint be enlarged by thirty days, to March 15, 2015. Since that date falls on a Sunday, the defendants' new deadline would

then be Monday, March 16, 2015. A proposed order is being submitted electronically to the Court's "orders" email address.

Respectfully submitted,

JOHN R. PARKER  
Acting United States Attorney

/s/ Brian W. Stoltz  
Brian W. Stoltz  
Assistant United States Attorney  
Texas Bar No. 24060668  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214-659-8626  
Facsimile: 214-659-8807  
brian.stoltz@usdoj.gov

Attorneys for Plaintiff

/s/ Sanford R. Denison  
SANFORD R. DENISON  
Texas Bar No. 05655560  
Baab & Denison, LLP  
6301 Gaston Avenue, Suite 550  
Dallas, Texas 75214  
Telephone: (214) 637-0750  
Facsimile: (214) 637-0730  
Email: denison@baabdenison.com

Attorneys for Defendants

Certificate of Conference

The parties have conferred about the request requested in this motion, and are in agreement. Therefore, the motion is presented as an agreed joint motion.

/s/ Brian W. Stoltz  
Brian W. Stoltz  
Assistant United States Attorney

Certificate of Service

On February 4, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian W. Stoltz  
Brian W. Stoltz  
Assistant United States Attorney